

2011 Jun-06 PM 08:48
U.S. DISTRICT COURT
N.D. OF ALABAMA

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

GEORGE R. CHAPMAN, JR.

Plaintiff,

VS.

**CIVIL ACTION NO.:
6:09-cv-1748-SLB**

**WALKER COUNTY, ALABAMA,
et al.**

Defendants.

**DEFENDANTS' EVIDENTIARY SUBMISSIONS IN SUPPORT OF
THEIR MOTION FOR SUMMARY JUDGMENT**

COME NOW the Defendants, Walker County, Alabama, Sheriff John Mark Tirey and Trenton McCluskey, in the above-styled cause, and submit the following Evidentiary Materials in support of their contemporaneously filed Motion for Summary Judgment:

- A Deposition of the Plaintiff, George R. Chapman, Jr.
- B Deposition of Sheriff John Mark Tirey
- C Deposition of Trenton McCluskey
- D Deposition of Rachel Harper
- E Letter of September 24, 2008 hiring the Plaintiff as a full-time jailer
- F Notice outside M-Dorm

- G Walker County Jail Policy and Procedure, Section 7, Title 7.12,
Transportation of Inmates
- H Walker County Jail Policy and Procedure, Section 7, Title 7.09,
Use of Force and Restraints
- I Letter from Trent McCluskey to Sheriff Tirey dated October 9,
2008
- J Walker County Jail Policy and Procedure regarding Batons
- K Correspondence from Sergeant Rachel Harper to Trent
McCluskey dated November 4, 2008
- L Correspondence from Trent McCluskey to Sheriff Tirey dated
November 3, 2008
- M Statement of Sergeant Rachel Harper
- N Statement of Officer Killingsworth
- O Statement of Officer Tiffany Clifton
- P Statement of Officer Mary Phillips
- Q Statement of Inmate Jerald Kennedy
- R Statement of Inmate Donald May
- S Statement of Inmate Vester Stiles
- T Statement of Inmate George Bryant
- U Statement of Inmate Ralph Woods

- V Statement of Inmate Steven Garner
- W Statement of Inmate James Lawson
- X Statement of Inmate Ronald Grant
- Y Letter from Sheriff Tirey to the Plaintiff dated November 7,
2008 terminating the Plaintiff

Respectfully submitted this the 6th day of June 2011.

/s/Kristi A. Dowdy

Kristi A. Dowdy (DOW016)

Attorney for Defendants

Law Offices of Kristi A. Dowdy, P.C.

300 N. Richard Arrington Jr. Blvd.

Suite 200

Birmingham, Alabama 35203

(205) 252-1146 – Telephone

(205) 252- 4907 – Facsimile

kristidowdylaw@att.net– email

CERTIFICATE OF SERVICE

I hereby certify that on this the 6th day of June, 2011, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to the following CM/ECF participants: **John D. Saxon, Esq.**

/s/Kristi A. Dowdy

OF COUNSEL